

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

**In Re . . .**

**Criminal Complaint**

) Criminal No. 5:25-MJ-125 (MJK)

)

) **Government's Unsealing Application**

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The United States of America, by and through its counsel of record, the United States Attorney for the Northern District of New York ["NDNY"], hereby applies to the Court to unseal the following document: Criminal Complaint filed on 4/25/25 in Criminal No. 5:25-MJ-125 (MJK). The reasons provided for the sealing of such document are no longer applicable.

Dated: April 28, 2025

JOHN A. SARCONI III  
United States Attorney

By: /s/ Geoffrey JL Brown

Geoffrey JL Brown  
Assistant United States Attorney  
Bar Roll No. 513495